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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MARLAINA SMITH,

Plaintiff,

v.

TRANS UNION, LLC; EQUIFAX
INFORMATION SERVICES, LLC;
EXPERIAN INFORMATION SOLUTIONS,
INC.; JPMORGAN CHASE BANK, N.A.;
CITIBANK, N.A.; BANK OF AMERICA,
N.A.; MAXIMUS EDUCATION LLC DBA
AIDVANTAGE; AND NAVIENT
SOLUTIONS, LLC,

Defendants.

Case No.: 2:22-cv-02041-GMN-NJK

**ORDER TO
EXTEND DEADLINE TO RESPOND
TO COMPLAINT
(First Request)**

STIPULATION

Defendant Maximum Education LLC dba Aidvantage (“Aidvantage”), by and through its counsel of record, Patrick J. Reilly, Esq., and Ashley N. Schobert, Esq., of the law firm of Brownstein Hyatt Farber Schreck, LLP, and Plaintiff Marlaina Smith (“Plaintiff”) by and through her counsel of record, George Haines, Esq., and Gerardo Avalos, Esq., of Freedom Law Firm, LLC, hereby stipulate and agree as follows:

1. On January 10, 2023, Plaintiff filed her First Amended Complaint for Damages

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1 Under the FCRA, 15 U.S.C. §1681 (the “Complaint”). ECF No. 35.

2 2. On or about January 11, 2023, Plaintiff served the Summons and Complaint on
3 Aidvantage.

4 3. The current deadline for Aidvantage to respond to Plaintiff’s Complaint is February
5 1, 2023.

6 4. Plaintiff has agreed to grant an extension for Aidvantage to answer or otherwise
7 plead in response to the Complaint.

8 5. Aidvantage shall have up to, and including, February 15, 2023, in which to answer
9 or otherwise plead in response to Plaintiff’s Complaint.

10 6. Aidvantage seeks additional time to respond to the Complaint so that it may gather
11 additional relevant documentation and information, conduct an initial investigation of the
12 Complaint’s allegations in order to formulate a response to the Complaint, and confer with
13 opposing counsel regarding possible settlement of this action.

14 7. This stipulation is brought in good faith by all parties and not for purposes of delay.
15 This extension will not result in any undue delay in the administration of this case.

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1 8. This is the first request for extension of time requested by the parties with respect to
2 responding to the Complaint.

3 DATED this 1st day of February, 2023.

 DATED this 1st day of February, 2023.

4 /s/ Patrick J. Reilly

5 Patrick J. Reilly, Esq.

6 Ashley N. Schobert, Esq.

 BROWNSTEIN HYATT FARBER

 SCHRECK, LLP

7 100 North City Parkway, Suite 1600

8 Las Vegas, NV 89106

9 Attorneys for Maximus Education LLC
 dba Aidvantage

/s/ Gerardo Avalos

 George Haines, Esq.

 Gerardo Avalos, Esq.

 FREEDOM LAW FIRM

 8985 S. Eastern Avenue, Suite 350

 Las Vegas, NV 89123

 Attorneys for Marlaina Smith

11 **ORDER**

12 IT IS SO ORDERED.

13 
14 UNITED STATES MAGISTRATE JUDGE

15 Dated: February 2, 2023
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